

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

MICHAEL B. JONES,	)	
	)	
	)	19-cv-924
v.	)	
Plaintiff,	)	
	)	JURY TRIAL DEMANDED
	)	
CITY PLAZA, LLC, T.E. JOHNSON &	)	
SONS, INC., and ONLINE INFORMATION	)	
SERVICES, INC.,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF'S MOTION FOR EXTENSIONS OF TIME  
TO RESPOND TO DEFENDANTS' MOTIONS TO DISMISS**

Plaintiff Michael B. Jones moves the Court, under Fed. R. Civ. P. 6(b) and LR 6.1(a), for an extension of time to serve his Oppositions to Defendants' Motions to Dismiss (ECF#12, ECF#14, ECF#21), and in support thereof respectfully shows the Court:

1. That the time originally prescribed for filing and service of each such Opposition has not yet expired;
2. That Plaintiff's Oppositions to the Motions of City Plaza, LLC and T.E. Johnson & Sons, Inc. are currently due on or before December 11, 2019 and Plaintiff's Opposition to the Motion of ONLINE Information Services, Inc. is currently due on or before December 26, 2019;
3. That Plaintiff has not previously been granted extensions of time for filing his Oppositions;

4. That counsel for Plaintiff consulted with Defendants' counsel, who have consented to the extensions;

5. That Plaintiff's counsel needs additional time to prepare Plaintiff's Oppositions because, in recent weeks, he has traveled out-of-state multiple times for court appearances, a conference, and for the Thanksgiving holiday.

WHEREFORE, Plaintiff respectfully asks the Court to issue an order extending the time for filing his Opposition to City Plaza, LLC's Motion to Dismiss (ECF#12) an additional 16 days, up to and including December 27, 2019; extending the time for filing his Opposition to the Motion to Dismiss of T.E. Johnson & Sons, Inc. (ECF#14) an additional 16 days, up to and including December 27, 2019; and extending the time for filing his Opposition to the Motion to Dismiss of ONLINE Information Services, Inc. (ECF#21) one additional day, up to and including December 27, 2019.

This the 11th day of December, 2019.

/s/ Jonathan R. Miller  
Jonathan R. Miller  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document will be electronically served on the following persons by the Court's CM/ECF system:

Jack B. Bayliss, Jr.

Rachel Scott Decker

Trisha L. Barfield

John L. Wait

Caren D. Enloe

Dated: Saint Louis, Mo.  
December 11, 2019

/s/ Jonathan R. Miller  
Jonathan R. Miller